UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RAW STORY MEDIA, INC., ALTERNET MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC,

Defendants.

Civil Action No. 1:24-cv-1514-CM-OTW

JOINT MOTION FOR TELEPHONIC CONFERENCE

The parties respectfully request that the Court conduct the April 18, 2024 conference telephonically, should the conference be necessary. Many of the attorneys for the parties reside outside New York, and the parties would prefer to avoid the expense of travel. In addition, counsel for Plaintiffs who plans to conduct the conference for Plaintiffs is scheduled to attend a conference in Washington D.C. on that date.

Dated: April 10, 2024

RESPECTFULLY SUBMITTED,

/s/ Matthew V. Topic

Jonathan Loevy, *pro hac vice*Michael Kanovitz, *pro hac vice*Lauren Carbajal, *pro hac vice*Stephen Stich Match (No. 5567854)
Matthew Topic, *pro hac vice*

LOEVY & LOEVY 311 North Aberdeen, 3rd Floor

Chicago, IL 60607 312-243-5900 jon@loevy.com mike@loevy.com carbajal@loevy.com match@loevy.com matt@loevy.com ai@loevy.com

Attorneys for Plaintiffs

LATHAM & WATKINS LLP

By: /s/ Allison L. Stillman

LATHAM & WATKINS LLP Joseph R. Wetzel joseph.wetzel@lw.com Andrew M. Gass (pro hac vice) andrew.gass@lw.com 505 Montgomery Street, Suite 2000 San Francisco, CA 94111 Telephone: 415.391.0600

Sarang V. Damle sy.damle@lw.com 555 Eleventh Street, NW, Suite 1000 Washington, D.C. 20004 Telephone: 202.637.2200

Allison L. Stillman alli.stillman@lw.com Luke A. Budiardjo luke.budiardjo@lw.com 1271 Avenue of the Americas New York, NY 10020 Telephone: 212.751.4864

Attorneys for Defendants
OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, and OPENAI
HOLDINGS, LLC

MORRISON & FOERSTER LLP

By: /s/ Allyson R. Bennett

MORRISON & FOERSTER LLP Joseph C. Gratz (pro hac vice) JGratz@mofo.com Vera Ranieri (pro hac vice) VRanieri@mofo.com 425 Market Street San Francisco, CA 94105 Telephone: 415.268.7000

Allyson R. Bennett (pro hac vice)
ABennett@mofo.com
Rose Lee (pro hac vice)
RoseLee@mofo.com
707 Wilshire Boulevard
Los Angeles, CA 90017
Telephone: 213.892.5355

Attorneys for Defendants
OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, and OPENAI
HOLDINGS, LLC